

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

2013 MAY 30 PM 4:30

Stacy Jones

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Disable America
Veterans

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff,

Stacy Jones

(name of plaintiff)

is a citizen of the United States and resides at

4043 Leroy Ave

(street address)

Memphis

(city)

Shelby

(country)

Tn

(state)

38108

(zip code)

(901) 212-9465

(telephone number)

3. Defendant Disable American
(defendant's name)
 lives at, or its business is located at 3440 Summer Ave
Mphs Tn 38122
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
3440 Summer Ave.
(street address)
Mphs Shelby Tn 38122
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 14 10 2009
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 22 3 2011
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on After March 4th. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ___ race, (2) ___ color, (3) ☒ sex, (4) ___ religion, (5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) ___ terminated plaintiff's employment.

(c) ___ failed to promote plaintiff.

(d) ☒ Back pay Compensation for my damage and harm and lost and front pay

10. The circumstances under which defendant discriminated against plaintiff were as follows: _____

See Attached

11. The acts set forth in paragraph 9 of this complaint

- (a) _____ are still being committed by defendant.
- (b) ☒ are no longer being committed by defendant.
- (c) _____ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) _____ Defendant be directed to employ plaintiff, or
- (b) _____ Defendant be directed to re-employ plaintiff, or
- (c) _____ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to _____

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ☒ No ()

Stacy Jones
SIGNATURE OF PLAINTIFF

If Job Applicant, Date You Applied for Job Nov. 4, 2008 Job Title Applied For Cashier
 Date Hired Nov. 13, 2008

4. What is the reason (basis) for your claim of employment discrimination?

FOR EXAMPLE, if you feel that you were treated worse than someone else because of race, you should check the box next to Race. If you feel you were treated worse for several reasons, such as your sex, religion and national origin, you should check all that apply. If you complained about discrimination, participated in someone else's complaint, or filed a charge of discrimination and a negative action was threatened or taken, you should check the box next to Retaliation.

☐ Race ☒ Sex ☐ Age ☐ Disability ☐ National Origin ☐ Religion ☒ Retaliation ☐ Pregnancy ☐ Color (typically a difference in skin shade within the same race) ☐ Genetic Information; circle which type(s) of genetic information is involved: i. genetic testing ii. family medical history iii. genetic services (genetic services means counseling, education or testing)

If you checked color, religion or national origin, please specify: _____

If you checked genetic information, how did the employer obtain the genetic information? _____

Other reason (basis) for discrimination (Explain): Sexual harassment hostel work environment due to sex and Retaliation

5. What happened to you that you believe was discriminatory? Include the date(s) of harm, the action(s), and the name, title(s) of the person(s) who you believe discriminated against you. Please attach additional pages if needed.
 (Example: 10/02/06 - Discharged by Mr. John Soto, Production Supervisor)

* A. Date: 10-09-02-11 Action: Sexual harassment hostel work environment and Retaliation
C-Calender

Name and Title of Person(s) Responsible: Supervise Mr. Larry Elzey

B. Date: C-Calender Action: Sexual harassment - hostel work

Mr. Campbell - C-Calender Coworker Wayne Davis C-Calender Jeremy

* Name and Title of Person(s) Responsible: _____

6. Why do you believe these actions were discriminatory? Please attach additional pages if needed.

They created a hostel work environment for me.
And the men on my job weren't treated like me

7. What reason(s) were given to you for the acts you consider discriminatory? By whom? His or Her Job Title?

They did not justify. The sexual harassment hostel work
was let go for the Economy Economic - I believe I was let go for
sexual harassment and hostel work.

8. Describe who was in the same or similar situation as you and how they were treated. For example, who else applied for the same job you did, who else had the same attendance record, or who else had the same performance? Provide the sex, age, national origin, religion, or disability of these individuals, if known, and if it relates to your claim of discrimination. For example, if your complaint alleges race discrimination, provide the race of each person; if it alleges sex discrimination, provide the sex of each person; and so on. Use additional sheets if needed.

Of the persons in the same or similar situation as you, who was treated better than you?

Full Name	Race, sex, age, national origin, religion or disability	Job Title	Description of Treatment
A. Tom - male		Truck Driver	

Tom was never talked to in a Sexual way nor was he Sexual harassed.

B. Simion - male		Baler / truck Driver	
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Simion wasn't sexually harassed nor did they talk to him in a Sexual way.